20/10/2020

Reply of the European Union on

CL 2020/55/FH:
Request for comments on the decision tree and on methods of analysis for irradiated foods

Mixed Competence
European Union Vote

(I) COMMENTS ON THE DECISION TREE FOR IDENTIFICATION OF CRITICAL CONTROL POINTS

The European Union and its Member States (EUMS) would like to thank for the option to comment on an interesting outcome of a CCFH drafting group. Following the Codex request for comments on the decision for identification of critical control points we would thank the drafting group from Brazil, Honduras, Jamaica and Thailand for the diagrams developed.

As a general comment, further discussion and explanation for instance by examples could be helpful. Examples could assist to identify the benefit of option 1 and 2 in comparison to the already introduced diagram 2 in CAC/RCP 1-1969. In general, diagram 2 in CAC/RCP 1-1969 is still a valid decision tree to identify CCPs. Further, on the introduction of GHP in a flow diagram to identify CCPs seems to be questionable. GHP is the general prerequisite and the basis for hygiene in food production and does not need to be further highlighted in the determination of CCPs. GHP is a general principle and without GHP, even the idea of HACCP is unrealistic.

The EUMS prefer option 1, subject to the following changes:

- Delete Q2.
- Replace Q4 by “Does a control measure exist at this step that eliminate the identified hazard or reduce its likely occurrence to an acceptable level?". Otherwise, the reader is tempted to answer that Q4 is a repetition of Q1. The sentence could be simplified: “Does a control measure at this step result in an acceptable level of the hazard being controlled?” (see line 4 in section 3.7 of the General Principles of Food Hygiene). This simplification could apply also to Q3.

Rational
The CCFH has recommended a “decision tree for identification of critical control points (CCP)” be appended to the new version of the General Principles of Food Hygiene, in order to replace the “Decision tree to identify CCPs” of the old version. The decision tree should assist in the implementation of the second HACCP Principle “Determine the Critical Control Points” Therefore, the decision tree comes once the first HACCP principle has been applied. Because these actions have been fulfilled: “List all hazards that are likely to occur and associated with

each step, conduct a hazard analysis to identify the significant hazards", it is already established which hazard(s) should be prevented, eliminated or reduced to an acceptable level since their control is necessary for food safety. Therefore, Q2 of Option 1 (and Q3 and Q5 of Option 2) has already been answered.

According to the new General Principles of Food Hygiene, routine GHPs and GHPs requiring more attention are « control measures ». Otherwise, the reader is tempted to answer that Q4 is a repetition of Q1 (unless modified as proposed above).

The EUMS do not recommend option 2 because:

- Question 1 and question 2 seemed to be inconsistent: Question 1 says: Can the hazard be controlled at this step? If the answer is NO than the following question 2 stated: Do control measure exist at this step? This was already the question 1. Alternatively, "control measure" in Question 2 could be replaced by "a control measure resulting in an acceptable level of the hazard being controlled".
- Q3 and Q5 have already been answered before Q1.

(II) METHODS OF ANALYSIS FOR IRRADIATED FOODS

(i) The EUMS support the transfer of the methods from the General Methods for the Detection of Irradiated Foods (CXS 231-2001) to the Standard for Methods of Analysis and Sampling (CXS 234-1999). The EUMS have no objection regarding the decision to not establish performance criteria for these methods for the time being, given the difficulty of this task.

(ii) The EUMS consider that the methods in the table are fit for purpose and agree with the proposed amendments (deletion of the year, and specification of the commodities and provisions).